

JG:JSR

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

M 11-232

X

UNITED STATES OF AMERICA

C O M P L A I N T

- against -

NARDIA FRANCINA THOMPSON,
also known as
"Keshia Monique Woodson,"

(T. 8, U.S.C.,
§ 1326(a) and
1326(b)(2))

)

Defendant.

X

EASTERN DISTRICT OF NEW YORK, SS:

HENRY LAM, being duly sworn, deposes and states that he is an Enforcement Officer with Customs and Border Protection, duly appointed according to law and acting as such.

On or about March 2, 2011, within the Eastern District of New York and elsewhere, the defendant NARDIA FRANCINA THOMPSON, also known as "Keshia Monique Woodson," being an alien who had previously been arrested and convicted of an aggravated felony, to wit: Possession with Intent to Distribute Cocaine, was thereafter ordered deported from the United States, and departed the United States, who had not made a re-application for admission to the United States to which the Secretary of the Department of Homeland Security, successor to the Attorney General, had expressly consented, attempted to enter the United States.

(Title 8, United States Code, Section 1326(b)(2)).

The source of your deponent's information and the grounds for his belief are as follows:^{1/}

1. I am an Enforcement Officer with Customs and Border Protection ("CBP") and have been involved in the investigation of numerous cases involving the illegal re-entry of aliens. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file, including the defendant's criminal history record; and from reports of other law enforcement officers involved in the investigation.

2. On March 2, 2011, the defendant NARDIA FRANCINA THOMPSON, also known as "Keshia Monique Woodson," arrived at John F. Kennedy International Airport, in Queens, New York, aboard Air Jamaica Flight No. 9 from Kingston, Jamaica. At passport control, the defendant presented to a CBP enforcement officer a United States passport in the name of "Keshia Monique Woodson."

3. The defendant NARDIA FRANCINA THOMPSON, also known as "Keshia Monique Woodson, was sent to baggage control by CBP officers. At baggage control, THOMPSON exhibited nervous behavior and gave conflicting answers to questions concerning her

^{1/} Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

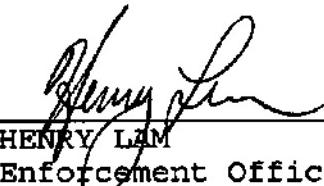
trip to Jamaica. THOMPSON was also unable to provide accurate information concerning family members.

4. THOMPSON was returned to passport control and fingerprinted. A search of the fingerprints in the Integrated Automated Fingerprint Identification System ("IAFIS") indicated that defendant's name was "Nardia Francina Thompson." IAFIS results also indicated that the defendant was convicted of Possession with Intent to Distribute Cocaine on September 24, 1996 in the Superior Court in the District of Columbia.

5. A check of CBP's computer database determined that the defendant had been ordered deported from the United States on or about June 19, 1997. Subsequently, the defendant failed to present herself to the Immigration and Naturalization Service for deportation.

6. A preliminary search of CBP files has revealed that there exists no request by the defendant NARDIA FRANCINA THOMPSON, also known as "Keshia Monique Woodson, for permission from the Secretary of the Department of Homeland Security, successor to the Attorney General, to re-enter the United States after self-deportation.

WHEREFORE, your deponent respectfully requests that the defendant NARDIA FRANCINA THOMPSON, also known as "Keshia Monique Woodson," be dealt with according to law.


HENRY LAM
Enforcement Officer
Customs and Border Protection

Sworn to before me this
3rd day of March, 2011

HONORABLE JOAN M. AZRACK
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK